

EXHIBIT 3

~~HIGHLY CONFIDENTIAL - Carrie Griffiths~~

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
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5 _____
6)
7) Civil Action No.
8) 5:16-cv-10444-JEL-MKM
9 In re: FLINT WATER CASES) (consolidated)
10)
11) Hon. Judith E. Levy
12) Mag. Mona K. Majzoub
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9 HIGHLY CONFIDENTIAL
10 Wednesday, November 16, 2022

12 Remote videotaped deposition of
13 CARRIE GRIFFITHS, held at the location of the witness
14 in Boston, Massachusetts, commencing at 9:09 a.m., on
15 the above date before Carol A. Kirk, Registered Merit
16 Reporter, Certified Shorthand Reporter, and Notary
17 Public.

22 GOLKOW LITIGATION SERVICES
23 877.370.3377 ph | 917.591.5672 fax
24 deps@golkow.com

1 correct?

2 MR. KRAMER: Objection.

3 A. I don't know. I would assume
4 that.

5 Q. Well, who would know? Who at
6 Veolia would know exactly who was responsible
7 for the tweets that were being generated during
8 the first bellwether trial from the Veolia
9 Twitter account?

10 A. I would assume that's
11 Pierre Farcot.

12 Q. Pierre Farcot. Why would you
13 assume that it's him?

14 A. My understanding is that Pierre
15 was the point person for the communications
16 related to the trial.

17 Q. Does that include -- strike that.

18 Are you aware of the website
19 veoliaflintfacts.com?

20 A. I am.

21 Q. And that website was created prior
22 to you joining any Veolia entity in 2018,
23 correct?

24 A. Correct.

1 Q. Do you understand that during
2 trial, the content of veoliaflintfacts.com
3 changed and had additions to it from prior to
4 the trial beginning?

5 MR. KRAMER: Objection.

6 A. That may be. I wasn't looking at
7 it closely during that time.

8 Q. Irrespective of whether you saw it
9 or not, are you aware that content was added to
10 that website during the first Flint bellwether
11 trial?

12 A. I'm not sure.

13 Q. Who would be responsible for
14 adding content to the veoliaflintfacts.com
15 website today?

16 A. I'm assuming that would be Pierre.

17 Q. Who would have been responsible
18 for adding content to the Veolia Flint Facts
19 website during the first bellwether trial?

20 A. Didn't I just answer that? Isn't
21 that the question you just asked?

22 Q. It's not. But is it the same
23 answer?

24 I asked you who would be

1 responsible today, and then I asked you who
2 would have been responsible during the trial.

3 MR. KRAMER: I don't think --

4 Q. So let me ask it -- let me strike
5 all that and start over.

6 Sitting here today on November 16,
7 2022, who was responsible amongst all the Veolia
8 entities with any content that's added to the
9 veoliaflintfacts.com website?

10 A. It would be Pierre, but I believe
11 he's not with the company anymore. I'm not sure
12 who it is right now.

13 Q. Okay. We'll get to Pierre in a
14 minute.

15 During the trial, during the first
16 Flint bellwether trial, who would have been
17 responsible for the content additions associated
18 with the veoliaflintfacts.com website?

19 A. I assume that's Pierre.

20 Q. Okay. Prior to the first
21 bellwether trial, who would have been
22 responsible for additions of content to the
23 veoliaflintfacts.com website?

24 A. Pierre.